



Leonard J. Cali
Vice President – Law
& Director of Federal Government Affairs

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2120
FAX 202-457-3205

January 30, 2003

Via Electronic Filing
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: In the Matter of Review of Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers and Implementation of the Local Competition Provisions in the Local Telecommunications Act of 1996; CC Docket Nos. 01-338, 96-98, 98-147

Dear Ms. Dortch:

Yesterday, I discussed with Jordan Goldstein, Senior Legal Advisor to Commissioner Michael J. Copps, matters related to the referenced proceeding. In particular, I discussed the important role of the states in fostering competition in local markets, and the central role that the states should play in any determination to “de-list” UNEs. I emphasized the importance of preserving state discretion to establish unbundling obligations in addition to those identified by the Commission. I also emphasized that the record in the Triennial Review proceeding demonstrates continuing operational and economic impairments concerning UNEs, as set forth in AT&T’s written submissions, particularly UNE switching. I underscored that loop access and provisioning difficulties along with loop, collocation, transport, and related costs continue to preclude the deployment of competitive switches for residential and small business markets throughout the country. Accordingly, the Commission should require the unbundling of switching to serve residential and small business customers. My comments were consistent with AT&T’s written submissions in the referenced proceeding.

One electronic copy of this Notice is being submitted for the referenced proceeding in accordance with the Commission’s rules.

Sincerely,

A handwritten signature in dark ink, appearing to read "L. Cali".

cc: J. Goldstein